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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 WELLS FARGO BANK, NATIONAL
13 ASSOCIATION, AS TRUSTEE FOR
14 MORGAN STANLEY CAPITAL I INC.
15 TRUST 2006-HE1, MORTGAGE PASS-
16 THROUGH CERTIFICATES, SERIES 2006-
17 HE1,

18 Plaintiff,

19 vs.

20 WESTCOR LAND TITLE INSURANCE
21 COMPANY; DOE INDIVIDUALS I through
22 X; and ROE CORPORATIONS XI through
23 XX, inclusive,

24 Defendants.

Case No.: 2:21-cv-00326-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTION TO DISMISS [ECF No. 6]**

[First Request]

25 Plaintiff, Wells Fargo Bank, National Association, as Trustee for Morgan Stanley
26 Capital I Inc. Trust 2006-HE1, Mortgage Pass-Through Certificates, Series 2006-HE1 (“Wells
27 Fargo”) and Defendant Westcor Land Title Insurance Company (“Westcor”), by and through
28 their counsel of record, hereby stipulate and agree as follows:

1. On January 22, 2021, Wells Fargo filed its Complaint in Eighth Judicial District Court, Case No. A-21-828236-C [ECF No. 1-1];
2. On February 26, 2021, Westcor filed its Petition for Removal to this Court [ECF No. 1];
3. On March 5, 2021, Westcor filed a Motion to Dismiss [ECF No. 6];

4. Wells Fargo's deadline to respond to Westcor's Motion to Dismiss is currently March 19, 2021;
5. Wells Fargo's counsel is requesting an extension until April 19, 2021, to file its response to the pending Motion to Dismiss;
6. This extension is requested to allow Wells Fargo additional time to finalize and file its response to the pending Motions to Dismiss as lead handling counsel for Wells Fargo continues to recover from an unexpected medical emergency.
7. Counsel for Westcor does not oppose the requested extension;
8. This is the first request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 15th day of March, 2021.

DATED this 15th day of March, 2021.

WRIGHT, FINLAY & ZAK, LLP

MAURICE WOOD

/s/ Lindsay D. Robbins

/s/ Brittany Wood

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Mortgage Pass-Through Certificates, Series
2006-HE1*

*Attorney for Defendant, Westcor Land Title
Insurance Company*

IT IS SO ORDERED.

Dated March 17, 2021.


UNITED STATES DISTRICT COURT JUDGE